



City of Seattle

Gregory J. Nickels, Mayor

Seattle Public Utilities

Chuck Clarke, Director

May 19, 2006

Mr. Jay Manning
Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Subject: Phase I Municipal Stormwater NPDES and State Waste Discharge
General Permit, February 15, 2006 Draft

Dear Mr. Manning:

Thank you for the opportunity to comment on Ecology's preliminary Phase I Stormwater NPDES Permit. We hope that our comments and suggestions will be helpful in finalizing a permit that will help us all move toward our shared goal of improving water quality in Washington.

The diversity of receiving waters that define Seattle are among our greatest riches – important to our economic livelihood, engrained in our history and culture, a resource to our community, and an integral part of the ecological web that we value. As such, Seattle believes that the long-term goal of meeting Water Quality Standards in the receiving waters is a priority. In order to move toward that goal, Seattle has implemented a strong Stormwater Management Program that utilizes capital projects, programs (e.g., education, business inspections), and operations and maintenance actions to protect and improve our lakes, creeks, and shoreline.

Meeting Water Quality Standards will require innovation, especially in a landscape such as Seattle – a city that is nearly 150 years old. Seattle has been working aggressively to identify and pilot innovative projects that emphasize decentralized stormwater management. Pilots such the Natural Drainage System Program, Street Sweeping, and Fecal Coliform Microbial Source Tracking are examples that highlight Seattle's commitment to determining the most effective and efficient actions to improve water quality.

With the existing Stormwater Management Program as a foundation, Seattle's pilot projects have become an integral part of identifying and optimizing effective approaches for improving water quality in our urban landscape. We also believe that they can serve as models for less developed areas and that the monitoring associated with these pilots may prove particularly useful to a Puget Sound recovery strategy.

We hope that Ecology will issue Seattle a municipal stormwater NPDES Permit that allows us to continue our efforts to develop and implement the best program to address our urban challenges. In order to do so, we need a permit that: 1) is clear about our joint desire to have Water Quality Standards in the receiving water body as the long-term goal of our efforts, 2) allows Seattle to direct our resources toward efforts that provide the greatest value to the environment for the level of investment we are making, and 3) has a mechanism by which can adjust our program under the permit as new useful data and information become available.

A better understanding of urban runoff priorities and solutions, the effectiveness of innovative pilot programs, and the hard data we collect on our actions is essential to achieving Water Quality Standards over time. In addition, Seattle is committed to sharing information gained through testing and monitoring pilot efforts as well as traditional approaches with other municipalities and jurisdictions in order to advance the Governor's Puget Sound Initiative through more effective stormwater management programs. We are further prepared to assist Ecology where we can with resources to achieve this broad education goal for Puget Sound.

Seattle's comments on the draft permit are focused on several areas: our desire to continue innovative and progressive programs, achieving clarity in the permit so Ecology's requirements can be effectively translated into functional programs, defining reasonable schedules that allow for the legal processes under which we work, and securing adequate engagement from Ecology to facilitate permit compliance.

We have provided information and permit comments in the following Attachments:

1. Fact sheet describing Seattle's Stormwater Management Program
2. Track changes version of the draft Permit
3. Comments on draft Permit Appendices and Fact Sheet
4. Comments on S1 (Permit Coverage & Permittees) regarding King County as a Co-Permittee
5. Comments on S2 (Authorized Discharges) and S4 (Compliance with Standards)
6. Comments on S8 (Monitoring)
7. General comments on other issues in the draft Permit

Seattle is also submitting this document as comments on the Draft Phase II Municipal Stormwater NPDES and State Waste Discharge General Permit (February 15, 2006), to be considered by Ecology for those aspects the Phase I and Phase II permits have in common. We also are incorporating by reference our comments made to Ecology in our letter dated August 31, 2005, regarding the Preliminary Draft Permit.

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Thank you for your consideration of the City of Seattle's comments. We look forward to working with Ecology and other jurisdictions, organizations, and the public to protect and improve our aquatic ecosystems and those of Puget Sound and its river systems. If you have any questions regarding this letter, please feel free to contact Darla Inglis (206 233-7160) of my staff.

Sincerely,

Sally Marquis, Director
Surface Water Management Division
Seattle Public Utilities

- cc: Cover Letter and Fact Sheet only:
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